

# **EXHIBIT 1**

## **PART 1**

**FILED UNDER SEAL**

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1  | Accused Instrumentalities   |
|--|---|
| <p><b>[1.0]</b> A computing device comprising:</p> | <p>Google’s “Cast” technology enables an “Android, iOS, or Web app to direct its streaming video and audio to a TV or sound system,” where the app “becomes the remote control to play, pause, seek, rewind, stop, and otherwise control the media.” <a href="https://developers.google.com/cast.1">https://developers.google.com/cast.1</a> In Google’s “Cast” framework, there are two core categories of devices: (1) “sender” devices, which are computing devices installed with a Cast-enabled Android, iOS, Chrome, or browser-based app accessed via either an app store or Chromecast-enabled site URL<sup>2</sup> (including youtube.com, music.youtube.com, tv.youtube.com, and spotify.com), and (2) “receiver” devices, which are Cast-enabled media players such as an audio or video playback device. <i>See, e.g.,</i> <a href="https://developers.google.com/cast/docs/developers">https://developers.google.com/cast/docs/developers</a>; <a href="https://developers.google.com/cast/glossary">https://developers.google.com/cast/glossary</a>; <a href="https://developers.google.com/cast/docs/ux_guidelines">https://developers.google.com/cast/docs/ux_guidelines</a>.</p> <p>There are many different Cast-enabled Android, iOS, Chrome, or browser-based apps that allow a user to transfer playback of streaming media content from the user’s smartphone, tablet, or computer device to a Cast-enabled media player and then control the Cast-enabled media player’s playback using the Cast-enabled app. This includes Google’s own Cast-enabled apps, such as the YouTube Music app, the YouTube app, the YouTube TV app, and the YouTube Kids app, as well as a host of different third-party Cast-enabled apps, such as the Spotify app. <i>See, e.g.,</i> <a href="https://support.google.com/chromecastbuiltin/answer/6279384?hl=en#zippy=%2Cbefore-you-begin-casting%2Ccast-from-chromecast-enabled-apps-to-your-audio-device%2Cfind-new-content-to-cast">https://support.google.com/chromecastbuiltin/answer/6279384?hl=en#zippy=%2Cbefore-you-begin-casting%2Ccast-from-chromecast-enabled-apps-to-your-audio-device%2Cfind-new-content-to-cast</a>; <a href="https://www.google.com/chromecast/built-in/apps/">https://www.google.com/chromecast/built-in/apps/</a>. These Cast-enabled apps can be installed and run on any smartphone, tablet, or computer device that supports Android, iOS, Chrome, or browser-based apps, including Google’s own “Pixel” smartphone, tablet, and computer devices (<i>e.g.,</i> the Pixel, Pixel XL, Pixel 2, Pixel 2 XL, Pixel 3, Pixel 3 XL, Pixel 3a, Pixel 3a XL, Pixel 4, Pixel 4 XL, Pixel 4a, Pixel 4a (5G), Pixel 5, Pixel 5a (5G), Pixel 6 phones, the Pixel Slate tablet, and the Pixelbook and Pixelbook Go laptops) as well as many third-party smartphone, tablet, or computer device. <i>See, e.g.,</i> <a href="https://store.google.com/us/magazine/compare_pixel">https://store.google.com/us/magazine/compare_pixel</a>; <a href="https://store.google.com/us/product/google_pixelbook_specs">https://store.google.com/us/product/google_pixelbook_specs</a>; <a href="https://store.google.com/us/product/pixel_slate_specs">https://store.google.com/us/product/pixel_slate_specs</a>. For purposes of this chart, any smartphone, tablet, or computer device installed with a Cast-enabled Android, iOS, Chrome, or browser-based app (<i>e.g.,</i> accessed</p> |

<sup>1</sup> Additional information regarding the accused instrumentalities is set forth in the Infringement Contention Chart for U.S. Patent No. 9,967,615 (Ex. A), which is incorporated herein by reference.

<sup>2</sup> *See, e.g.,* <https://support.google.com/chromecast/answer/3265953?hl=en>.

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>via an app store or Chromecast-enabled site URL) that allows a user to transfer playback of streaming media content from the smartphone, tablet, or computer device to a Cast-enabled media player and then control the Cast-enabled media player’s playback using the Cast-enabled app will be referred to as a “Cast-enabled computing device.”</p> <p>As set out in the Supplemental Infringement Contentions, Sonos has endeavored to list the possible third-party smartphone, tablet, and computer devices that may have been used to download and install one or more accused Cast-enabled apps between May 2018 to present. <i>See</i> Appx. 1. Each of these third-party smartphone, tablet, and computer devices, when installed with at least one Cast-enabled app, meets all elements of the claims as explained in more detail herein. As set forth below, Sonos cites representative examples of Google smartphone, tablet, and computer devices meeting elements 1.1, 1.2, and 1.3, but notes that the hardware aspects recited in elements 1.1, 1.2, and 1.3 have become ubiquitous among all smartphone, tablet, and computer devices. Each possible third-party smartphone, tablet, and computer device listed in Appendix 1 contains these aspects and thus meets elements 1.1, 1.2, and 1.3.</p> <p>There are also many different Cast-enabled media players to which playback of streaming media content can be transferred from a Cast-enabled computing device. This includes Google’s own Cast-enabled media players, such as the Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Wifi Point, Chromecast, Chromecast Audio, Chromecast Ultra, Chromecast with Google TV, and Nest Audio media players, as well as various other third-party media players with built-in Cast functionality. <i>See, e.g.,</i> <a href="https://store.google.com/us/product/google_home_max?hl=en-US">https://store.google.com/us/product/google_home_max?hl=en-US</a>; <a href="https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US">https://store.google.com/us/product/chromecast_google_tv_compare?hl=en-US</a>; <a href="https://www.google.com/chromecast/built-in/audio/">https://www.google.com/chromecast/built-in/audio/</a>.</p> <p>Certain of these Cast-enabled media players also include a display screen and firmware that enables the Cast-enabled media players to additionally function as a control device for other Cast-enabled media players. This sub-category of Cast-enabled media players, which will be referred to herein as “Cast-enabled displays,” includes Google’s Home Hub, Nest Hub, and Nest Hub Max media players. <i>See, e.g.,</i> <a href="https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music">https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music</a>; <a href="https://store.google.com/us/product/google_nest_hub_max?hl=en-US">https://store.google.com/us/product/google_nest_hub_max?hl=en-US</a>; <a href="https://support.google.com/googlenest/answer/9165738?hl=en">https://support.google.com/googlenest/answer/9165738?hl=en</a>. Similar to the Cast-enabled computing devices, these Cast-enabled displays have Cast-enabled software (e.g., firmware and/or Cast-enabled apps)</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

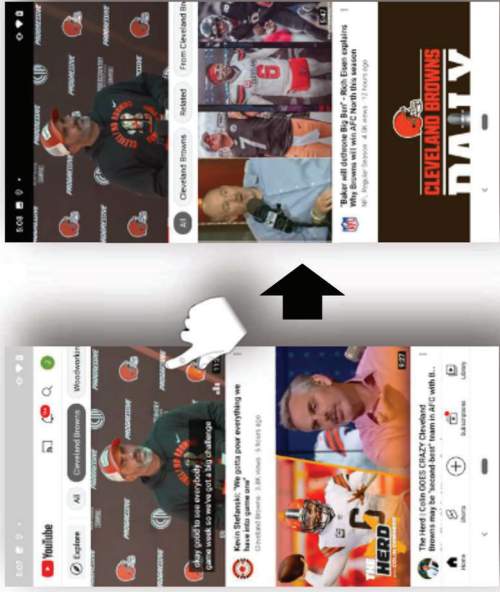
| Claim 1  | Accused Instrumentalities  |
|--|--|
|  | <p>that allows a user to transfer playback of streaming media content from the Cast-enabled display to another Cast-enabled media player and then control that other Cast-enabled media player’s playback using the Cast-enabled display’s user interface. For purposes of this chart, Cast-enabled computing devices and Cast-enabled displays may be referred to collectively as “Cast-enabled control devices.”</p> <p>Google also hosts backend software on Cloud-based infrastructure owned and/or operated by Google (sometimes referred to as Google Cloud Platform or “GCP” for short) that facilitates the aforementioned Cast functionality for transferring playback of streaming media content from a Cast-enabled control device to a Cast-enabled media player and/or controlling the Cast-enabled media player’s playback.</p> <p>As described in further detail below, each Cast-enabled control device is a “computing device,” as recited in claim 1. Further, because each Cast-enabled media player is a data network device (<i>i.e.</i>, a device that is configured to connect to and communicate over a medium that interconnects devices in a manner that enables them to send digital data packets to and receive digital data packets from each other) and is configured to process and output audio, each Cast-enabled media player is a “playback device” as recited in claim 1. <i>See, e.g.</i>, Pl.’s Opening Markman Br. (D.I. 60 of 20-cv-881-ADA) at pp. 4-6, 23-26, Exs. 24-25; Pl.’s Reply Markman Br. (D.I. 66 of 20-cv-881-ADA) at pp. 2-3, 10-12, Exs. 26-27; SONOS-SVG2-00018184 - SONOS-SVG2-00018236 [ITC Order No. 20] at p. 15;<br/> <a href="https://support.google.com/googleassistant/answer/7072284?hl=en">https://support.google.com/googleassistant/answer/7072284?hl=en</a>;<br/> <a href="https://support.google.com/chromecast/answer/3046409?hl=en">https://support.google.com/chromecast/answer/3046409?hl=en</a>;<br/> <a href="https://store.google.com/us/product/nest_wifi_specs?hl=en-US">https://store.google.com/us/product/nest_wifi_specs?hl=en-US</a>.</p> |
| [1.1] at least one processor;                    | <p>Each Cast-enabled control device includes at least one processor. <i>See, e.g.</i>,<br/> <a href="https://store.google.com/us/magazine/compare_pixel">https://store.google.com/us/magazine/compare_pixel</a>;<br/> <a href="https://store.google.com/us/product/google_pixelbook_specs">https://store.google.com/us/product/google_pixelbook_specs</a>;<br/> <a href="https://store.google.com/us/product/pixel_slate_specs">https://store.google.com/us/product/pixel_slate_specs</a>;<br/> <a href="https://store.google.com/us/product/google_home_max?hl=en-US">https://store.google.com/us/product/google_home_max?hl=en-US</a>.</p>   |
| [1.2] a non-transitory computer-readable medium; | <p>Each Cast-enabled control device includes a non-transitory computer-readable medium. <i>See, e.g.</i>,<br/> <a href="https://store.google.com/us/magazine/compare_pixel">https://store.google.com/us/magazine/compare_pixel</a>;<br/> <a href="https://store.google.com/us/product/google_pixelbook_specs">https://store.google.com/us/product/google_pixelbook_specs</a>;<br/> <a href="https://store.google.com/us/product/pixel_slate_specs">https://store.google.com/us/product/pixel_slate_specs</a>;<br/> <a href="https://store.google.com/us/product/google_home_max?hl=en-US">https://store.google.com/us/product/google_home_max?hl=en-US</a>.</p>  |



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1  | Accused Instrumentalities   |
|--|---|
| <p>[1.3] and program instructions stored on the non-transitory computer-readable medium that, when executed by the at least one processor, cause the computing device to perform functions comprising:</p>         | <p>Each Cast-enabled control device includes program instructions stored on the non-transitory computer-readable medium that enable the Cast-enabled control device to perform the functions identified below. <i>See, e.g.,</i> <a href="https://store.google.com/us/magazine/compare_pixel">https://store.google.com/us/magazine/compare_pixel</a>; <a href="https://store.google.com/us/product/google_pixelbook_specs">https://store.google.com/us/product/google_pixelbook_specs</a>; <a href="https://store.google.com/us/product/pixel_slate_specs">https://store.google.com/us/product/pixel_slate_specs</a>; <a href="https://store.google.com/us/product/google_home_max?hl=en-US">https://store.google.com/us/product/google_home_max?hl=en-US</a>.</p>  |
| <p>[1.4] operating in a first mode in which the computing device is configured for playback of a remote playback queue provided by a cloud-based computing system associated with a cloud-based media service;</p> | <p>Each Cast-enabled control device comprises program instructions stored on the Cast-enabled control device's non-transitory computer-readable medium that, when executed by the Cast-enabled control device's processor, cause the Cast-enabled control device to operate in a first mode in which the Cast-enabled control device is configured for playback of a remote playback queue provided by a cloud-based computing system associated with a cloud-based media service.</p> <p>For instance, each Cast-enabled computing device is programmed with the capability to operate in a mode in which the Cast-enabled computing device is configured for playback of a remote playback queue provided by a cloud-based computing system that takes the form of one or more cloud servers associated with a cloud-based media service (e.g., a Google service such as YouTube, YouTube Music, YouTube TV, YouTube Kids, etc. or a third-party service such as Spotify, etc.) that are remote from the Cast-enabled computing device and accessible over the Internet, which may be operated by Google or a third-party service provider. <i>See, e.g.,</i> <a href="https://support.google.com/googlenest/answer/7181830">https://support.google.com/googlenest/answer/7181830</a> [Play media from Chromecast-enabled apps to your speaker or display]; <a href="https://support.google.com/chromecast/answer/2995235?hl=en-AU">https://support.google.com/chromecast/answer/2995235?hl=en-AU</a> [Cast from the YouTube app and YouTube.com]; <a href="https://support.google.com/googlenest/answer/9563059?hl=en-IN">https://support.google.com/googlenest/answer/9563059?hl=en-IN</a> [Move media from one cast device to another]; <a href="https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en">https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en</a> [Cast YouTube TV using Chromecast]; <a href="https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid">https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid</a> [Watch</p> |

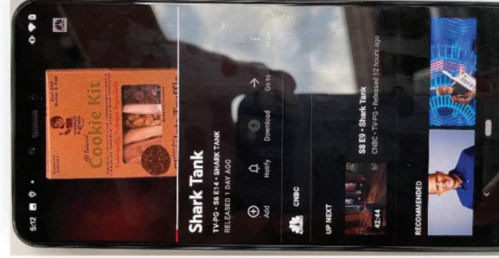
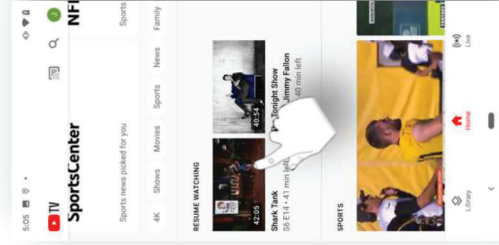
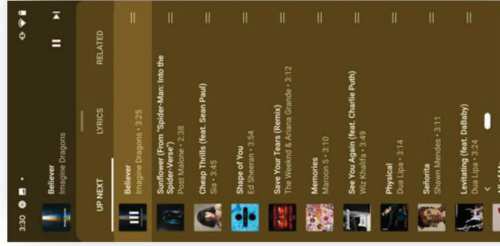
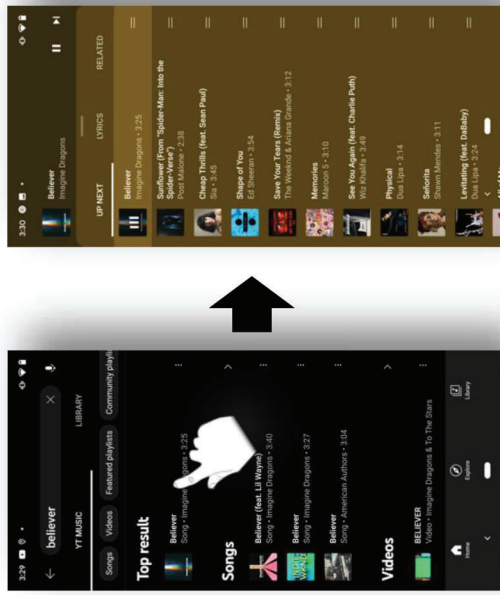
**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <p>YouTube Kids videos on your TV]; <a href="https://support.google.com/chromecast/answer/3265953?hl=en">https://support.google.com/chromecast/answer/3265953?hl=en</a> [Chromecast-enabled site vs. casting a tab]; <a href="https://support.google.com/youtube/answer/6327615?hl=en">https://support.google.com/youtube/answer/6327615?hl=en</a> [Autoplay videos]; <a href="https://developers.google.com/cast/docs/web_receiver/queueing">https://developers.google.com/cast/docs/web_receiver/queueing</a>; <a href="https://developers.google.com/cast/docs/ios_sender/queueing">https://developers.google.com/cast/docs/ios_sender/queueing</a>; <a href="https://developers.google.com/cast/docs/android_sender/queueing">https://developers.google.com/cast/docs/android_sender/queueing</a>; see also, e.g., [REDACTED]</p> <p>Cast-enabled computing devices installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube, YouTube Music, YouTube TV, and YouTube Kids apps, as illustrated by the following screenshots:</p>  |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY

Claim 1

Accused Instrumentalities



Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <div data-bbox="261 970 529 1545"> </div> <div data-bbox="342 886 431 947"> </div> <div data-bbox="261 296 529 873"> </div> <p>Likewise, Cast-enabled computing devices installed with various third-party Cast-enabled apps are also programmed to perform this functionality, including but not limited to the Spotify app, as illustrated by the following screenshot:</p> <div data-bbox="740 806 1243 1037"> </div> <p>Various other Cast-enabled apps available for installation on Cast-enabled computing devices provide similar functionality. See, e.g., <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to speakers]; <a href="https://www.google.com/chromecast/built-in/apps/">https://www.google.com/chromecast/built-in/apps/</a>.</p> |

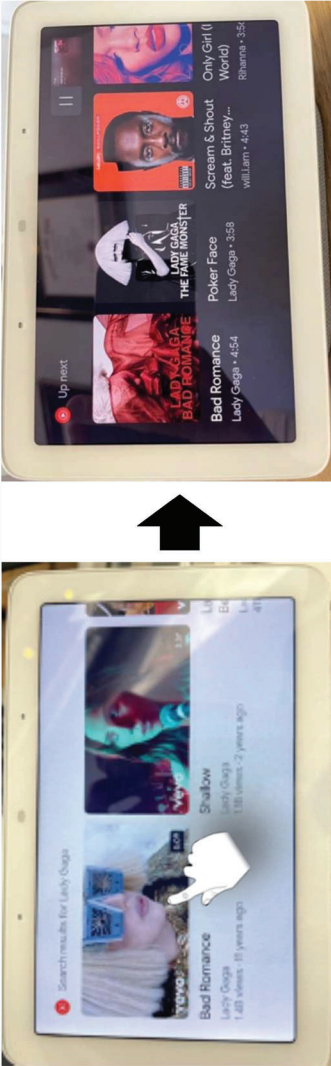
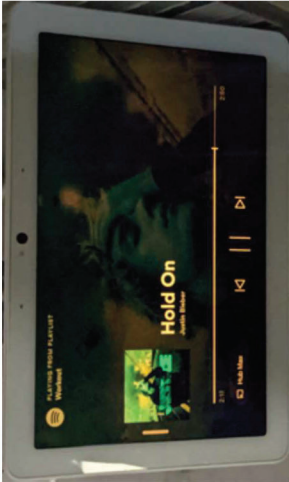


Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>Each Cast-enabled display is also programmed with the capability to operate in a mode in which the Cast-enabled display is configured for playback of a remote playback queue provided by a cloud-based computing system that takes the form of one or more cloud servers associated with a cloud-based media service (e.g., a Google service such as YouTube, YouTube Music, etc., or a third-party service such as Spotify, etc.) that are remote from the Cast-enabled display and accessible over the Internet, which may be operated by Google or a third-party service provider. <i>See, e.g.,</i> <a href="https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music">https://store.google.com/us/product/google_nest_hub?hl=en-US#overview-modal-music</a> (“YouTube Music on demand. . . . Stream top music services.”); <a href="https://store.google.com/us/product/google_nest_hub_max?hl=en-US">https://store.google.com/us/product/google_nest_hub_max?hl=en-US</a> (“[J]am out with YouTube Music.”); <a href="https://support.google.com/googlenest/answer/9165738?hl=en">https://support.google.com/googlenest/answer/9165738?hl=en</a> (“With YouTube built-in to your Google Nest display, you can watch YouTube Originals, how-to videos and much more, seamlessly on your screen.”).</p> <p>Cast-enabled displays installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube and YouTube Music apps, as illustrated by the following photos:</p> <div data-bbox="857 373 1190 1432"></div> |



Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <div></div> <p>Additionally, Cast-enabled displays installed with various third-party Cast-enabled apps are also programmed to perform this functionality, including but not limited to the Spotify app, as illustrated by the following photo:</p> <div></div> <p>Various other Cast-enabled apps available for installation on Cast-enabled displays provide similar functionality.</p> <p>Further details regarding how a Cast-enabled control device carries out this functionality, along with representative examples of other evidence demonstrating this functionality, are summarized below.</p> <p><b><u>YouTube, YouTube Music, YouTube TV, &amp; YouTube Kids apps</u></b></p> <p>Each Cast-enabled computing device installed with any one of the YouTube, YouTube Music, YouTube TV, or YouTube Kids app is programmed such that it can operate in a mode in which the Cast-enabled computing</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>device is configured for playback of a remote playback queue ([REDACTED]) associated with the YouTube, YouTube Music, YouTube TV, or YouTube Kids media service. The aforementioned functionality satisfies claim limitation 1.4.</p> <p>Faced with this clear evidence that Google’s Cast-enabled computing devices are capable of playing back a “remote playback queue” as required by claim limitation 1.4, and that Google’s Cast-enabled computing devices and Cast-enabled media players also utilize such a “remote playback queue” in the manner recited by the remaining limitations of claim 1 (as explained in further detail below), Google has now proposed a brand new construction for the term “playback queue,” which Google appears to be pursuing for the sole purpose of attempting to avoid infringement of the claim limitations that reference a “remote playback queue.”</p> <p>In particular, for the first time on February 3, 2022, Google took the position that the term “playback queue” should be construed as “[a]n ordered list of multimedia items that is selected by the user for playback.” In this regard, Google apparently intends to argue that the accused [REDACTED] queue is not a “remote playback queue” because it is not “[a]n ordered list of multimedia items that is selected by the user for playback,” although Google has not provided any explanation as to exactly why it has introduced this construction of “playback queue,” and it is still not clear how Google intends to interpret or apply this construction of “playback queue” in the context of the claims of the ’033 Patent. In any event, Sonos disagrees that this is the proper construction for “playback queue” as that term is used in the context of the ’033 Patent and will provide its position regarding the flaws in Google’s proposed construction during the claim construction process. However, even if the Court were to adopt such a construction for “playback queue,” Sonos maintains that the accused [REDACTED] queue would still amount to the claimed “remote playback queue” either literally or at the very least under the Doctrine of Equivalents (“DoE”), and because of this, each Cast-enabled computing device installed with any one of the YouTube, YouTube Music, YouTube TV, or YouTube Kids apps would still satisfy the claim limitations that reference a “remote playback queue” either literally or at the very least under DoE.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> |

**Ex. B—Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

[illegible]

<sup>3</sup> <https://support.google.com/youtube/answer/6327615?hl=en> [Autoplay videos]; <https://support.google.com/youtubekids/answer/6130531?hl=en> [Recommended videos]; <https://support.google.com/youtubekids/answer/6138623?hl=en&co=GENIE.Platform%3DAndroid> [Accessibility on YouTube Kids] (“When autoplay is turned on, we’ll automatically play another related video.”); [REDACTED]

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>the context of its new construction, and Sonos expressly reserves its right to further supplement its infringement contentions if Google later attempts to advance a new interpretation of the phrase “ordered list.”</p> <p>Turning to the second aspect of Google’s new construction of “playback queue,” Google is also now attempting to add a requirement that the “ordered list of multimedia items” be “selected by the user for playback.” Notably, Google has yet to provide any basis for its position that this new limitation is a required aspect of a “playback queue,” and it is still not clear how Google intends to interpret or apply this new limitation in the context of its construction. This is particularly the case given that Google seems to be defining the “remote playback queue” – which is a data structure that is configured to contain an identification of whatever media content is queued for playback at a given time (<i>i.e.</i>, a container) – in terms of the unrelated details as to how the media items contained within the “remote playback queue” were previously selected, which would result in a nonsensical interpretation of the claims where a data structure would qualify as a “remote playback queue” during some periods of time (<i>i.e.</i>, when it contains user-selected media items) and would not qualify as a “remote playback queue” during other periods of time (<i>i.e.</i>, when it does not contain user-selected media items) despite the fact that it is the exact same data structure and is being used in the exact same manner to facilitate playback. Nevertheless, Google appears to have imported this new limitation into its construction so that it can then argue that, because [REDACTED]</p> <p>[REDACTED]</p> <p>However, even setting aside the flaws in Google’s construction (which will be addressed during the claim construction process), such a non-infringement argument fails for several reasons.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Thus, because each Cast-enabled computing device installed with any one of the YouTube, YouTube Music, YouTube TV, or YouTube Kids apps is programmed to perform the functionality of claim limitation 1.4 (as well as the other claim limitations that refer to a “remote playback queue”), with respect to the “[REDACTED] queue that</p> |

**Ex. B – Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>literally amounts to “an ordered list of multimedia items that is selected by the user for playback,” each such Cast-enabled computing device would still literally satisfy claim limitation 1.4 (as well as the other claim limitations that refer to a “remote playback queue”) under Google’s construction for this additional reason.</p> <p><b>Second</b>, to the extent that the Court adopts Google’s construction of “playback queue” and Google then later tries to argue that a the [REDACTED] queue does not literally amount to an “ordered list of multimedia items that is selected by the user for playback” unless every single media item in the [REDACTED] queue is directly selected by the user, the relevant functionality carried out by a Cast-enabled computing device with respect to a [REDACTED] queue containing at least one media item that was directly selected by a user and other items that were not directly selected by a user (e.g., media items identified by a YouTube service based on the user’s selection) still satisfies claim limitation 1.4 (as well as the other claim limitations that refer to a “remote playback queue”) under DoE. This is because there is merely an insubstantial difference between (i) a Cast-enabled computing device (or Cast-enabled media player) having responsibility for playback of a “remote playback queue” in which all of the media items were directly selected by a user and (ii) a Cast-enabled computing device (or Cast-enabled media player having responsibility) for playback of a “remote playback queue” in which only the initial media item was directly selected by the user while the other media item was identified based on the user’s selection of the initial media item. Indeed, [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> |
|         | <p>For all of the foregoing reasons, Sonos maintains that, even if the Court were to adopt Google’s new construction for “playback queue,” each Cast-enabled computing device installed with any one of the</p>  |








**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>YouTube, YouTube Music, YouTube TV, or YouTube Kids apps would still satisfy claim limitation 1.4 (as well as the other claim limitations that reference the “remote playback queue”) literally, or at the very least, under DoE.</p> <p>While Sonos has made its best effort to interpret and understand Google’s evolving construction of “remote playback queue” / “playback queue,” and to provide Sonos’s infringement position under that evolving construction, it remains unclear how Google intends to interpret and apply that construction to the accused instrumentalities. As such, Sonos expressly reserves the right to further supplement its infringement contentions if Google later attempts to advance an interpretation of this construction that differs from Sonos’s current understanding.</p> <p>The following exemplary evidence demonstrates that each Cast-enabled control device installed with the YouTube, YouTube Music, YouTube TV, or YouTube Kids app is programmed with this functionality:</p> <ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• <a href="https://support.google.com/youtubekids/answer/6130531?hl=en">https://support.google.com/youtubekids/answer/6130531?hl=en</a> [Recommended videos];</li> <li>• <a href="https://support.google.com/youtubekids/answer/6138623?hl=en&amp;co=GENIE.Platform%3DAndroid">https://support.google.com/youtubekids/answer/6138623?hl=en&amp;co=GENIE.Platform%3DAndroid</a> [Accessibility on YouTube Kids] (“When autoplay is turned on, we’ll automatically play another related video.”);</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul> |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY


| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
| •       | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |
|         | [REDACTED]                |

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <div></div> <div><ul style="list-style-type: none"><li>• <i>Id.</i> at 90-91;</li><li>• <br/><br/></li></ul></div> <div>Representative excerpts of Google's YouTube app source code<sup>4</sup> related to the aforementioned functionality include:<br/></div> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         |  |




**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

\_\_\_\_\_

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

\_\_\_\_\_

\_\_\_\_\_

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

1 [REDACTED]



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p data-bbox="967 241 1073 1608">Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 15, including any of Google’s documents or source code cited therein. <i>See</i> Google LLC’s First Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact Discovery Interrogatories.</p> <p data-bbox="1114 1457 1146 1608"><u><i>Spotify app</i></u></p> <p data-bbox="1187 218 1328 1608">Each Cast-enabled computing device installed with the Spotify app is programmed such that it can operate in a mode in which the Cast-enabled computing device is configured for playback of a remote playback queue (e.g., a “Spotify queue”) provided by one or more cloud servers associated with the Spotify media service. The aforementioned functionality satisfies claim limitation 1.4.</p> |





**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 15, including any of Google’s documents or source code cited therein. <i>See</i> Google LLC’s First Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact Discovery Interrogatories.</p> <p><b><u>Cast-Enabled Displays</u></b></p> <p>Each Cast-enabled display is programmed such that it can operate in a mode in which the Cast-enabled display is configured for playback of a remote playback queue provided by one or more cloud servers associated with a particular media service that the Cast-enabled display was selected to playback from (e.g., YouTube, YouTube Music, Spotify, etc.). The aforementioned functionality satisfies claim limitation 1.4.</p> <p>The following exemplary evidence demonstrates that each Cast-enabled display is programmed with this functionality:</p> <ul style="list-style-type: none"> <li>• <a href="https://developers.google.com/cast/docs/web_receiver/queueing?hl=en">https://developers.google.com/cast/docs/web_receiver/queueing?hl=en</a> (“Queueing allows partner applications to better integrate with Cast by providing the following features: Support of Google’s and partner’s cloud queue implementation so externally stored and created queue can be directly loaded into Cast devices.”).</li> </ul> <p>Representative excerpts of Google’s Cast-enabled display source code<sup>9</sup> related to the aforementioned functionality include:</p> <div data-bbox="1003 186 1349 1661" style="background-color: black; height: 100px; width: 100%;"></div> |

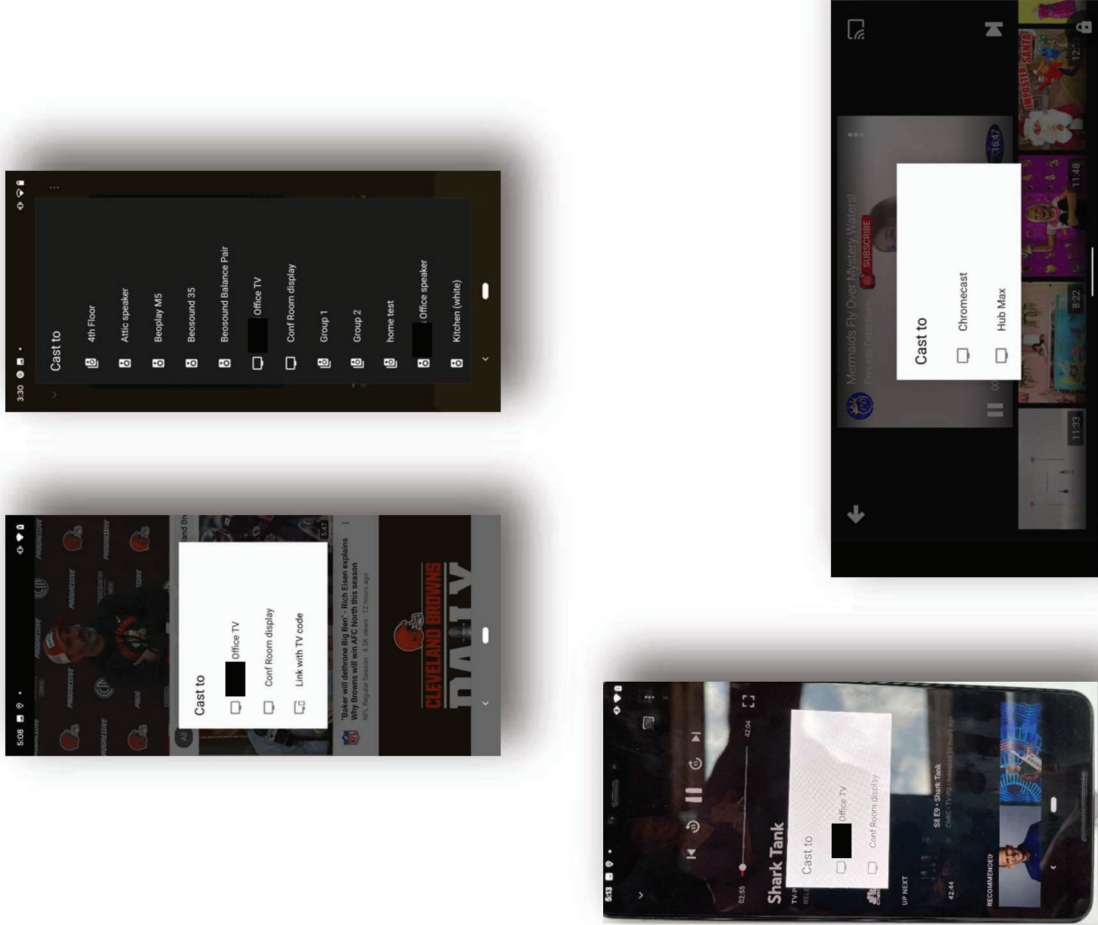
**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1  | Accused Instrumentalities   |
|--|---|
|  |   |
| <p><b>[1.5]</b> while operating in the first mode, displaying a representation of one or more playback devices in a media playback system that are each i) communicatively coupled to the computing device over a data network and ii) available to accept playback responsibility for</p> | <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 15, including any of Google's documents or source code cited therein. <i>See</i> Google LLC's First Objections and Responses to Plaintiff Sonos, Inc.'s First Set of Fact Discovery Interrogatories.</p> <p>Each Cast-enabled control device comprises program instructions stored on the Cast-enabled control device's non-transitory computer-readable medium that, when executed by the Cast-enabled control device's processor, cause the Cast-enabled control device to, while operating in the first mode, display a representation of one or more Cast-enabled media players in a Cast-enabled playback system that are each (i) communicatively coupled to the Cast-enabled control device over a data network and (ii) available to accept playback responsibility for the remote playback queue.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while operating in a mode in which the Cast-enabled computing device is configured for playback of a remote playback queue provided by a cloud server associated with a cloud-based media service (e.g., a Google service such as YouTube, YouTube Music, YouTube TV, YouTube Kids, etc., or a third-party service such as Spotify, etc.), the Cast-enabled computing device is operable to detect a selection of a displayed selectable option (e.g., a selectable "Cast button") for transferring playback of audio content (e.g., music, podcasts, etc.) and/or audiovisual content (e.g., videos) from the Cast-enabled computing device to another device, which triggers the Cast-enabled computing device to display a list of available devices for transferring playback that includes one or more Cast-enabled media players in a Cast-enabled playback system that are each (i) communicatively coupled to the Cast-enabled computing device over a Wi-Fi network and (ii) available to accept playback</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**


| Claim 1                    | Accused Instrumentalities  |
|----------------------------|--|
| the remote playback queue; | <p>responsibility for the remote playback queue. <i>See, e.g.,</i> <a href="https://support.google.com/googlenest/answer/7181830">https://support.google.com/googlenest/answer/7181830</a> [Play media from Chromecast-enabled apps to your speaker or display] (“Tap the Cast button  . . . Tap the speaker or display for which you’d like to cast.”); <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to speakers] (“2. In the top right corner, tap the Cast button  3. Choose your speaker.”); <a href="https://support.google.com/chromecast/answer/2995235?hl=en-AU">https://support.google.com/chromecast/answer/2995235?hl=en-AU</a> [Cast from the YouTube app and YouTube.com] (“Tap the Cast button  . . . Tap the Chromecast device to which you want to cast.”); <a href="https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en">https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en</a> [Cast YouTube TV using Chromecast] (“Tap Cast  . This is found at the top of the app Home screen. [ ] Choose the device you want to cast to.”); <a href="https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid">https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid</a> [Watch YouTube Kids videos on your TV]; <a href="https://support.google.com/chromecast/answer/3265953?hl=en">https://support.google.com/chromecast/answer/3265953?hl=en</a> [Chromecast-enabled site vs. casting a tab].</p> <p>Under the plain and ordinary meaning of the term “data network,” which is a medium that interconnects devices in a manner that enables them to send digital data packets to and receive digital data packets from each other, a Wi-Fi network is a “data network” as that term is used in claim 1. <i>See, e.g.,</i> Pl.’s Opening Markman Br. (D.I. 60 of 20-cv-881-ADA) at pp. 23-26, Exs. 24-25; Pl.’s Reply Markman Br. (D.I. 66 of 20-cv-881-ADA) at pp. 10-12, Exs. 26-27.</p> <p>Cast-enabled computing devices installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube, YouTube Music, YouTube TV, and YouTube Kids apps, as illustrated by the following screenshots:</p> |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY


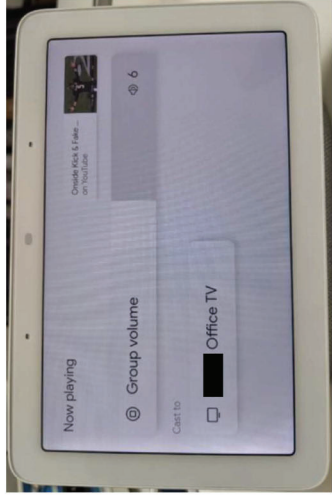
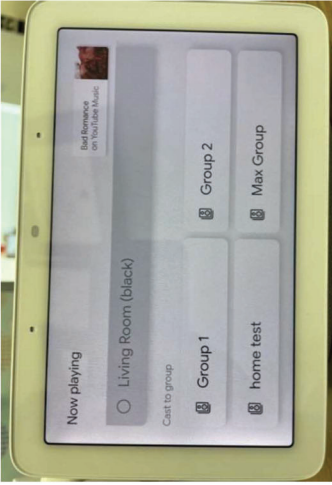
| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         |  |



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <div data-bbox="235 268 305 1612" style="background-color: black; height: 100px; width: 100%;"></div> <p data-bbox="342 247 448 1612">Likewise, Cast-enabled computing devices installed with various third-party Cast-enabled apps are also programmed to perform this functionality, including but not limited to the Spotify app, as illustrated by the following screenshot:</p> <div data-bbox="483 808 984 1039">  </div> <p data-bbox="1052 210 1157 1612">Various other Cast-enabled apps available for installation on Cast-enabled computing devices provide similar functionality. See, e.g., <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to speakers]; <a href="https://www.google.com/chromecast/built-in/apps/">https://www.google.com/chromecast/built-in/apps/</a>.</p> <p data-bbox="1198 210 1414 1612">Each Cast-enabled display is also programmed such that, while operating in a mode in which the Cast-enabled display is configured for playback of a remote playback queue provided by a cloud-based computing system associated with a cloud-based media service (e.g., a Google service such as YouTube, YouTube Music, etc., or a third-party service such as Spotify, etc.), the Cast-enabled display is operable to detect a selection of a displayed selectable option (e.g., a selectable “Cast button”) for transferring playback of audio content (e.g., music, podcasts, etc.) and/or audiovisual content (e.g., videos) from the Cast-enabled display to</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <p>another device, which triggers the Cast-enabled display to display a list of available devices for transferring playback that includes one or more other Cast-enabled media players in a Cast-enabled playback system that are each (i) communicatively coupled to the Cast-enabled display over a Wi-Fi network and (ii) available to accept playback responsibility for the remote playback queue. <i>See, e.g.,</i> <a href="https://support.google.com/googlenest/answer/9563059?hl=en-IN">https://support.google.com/googlenest/answer/9563059?hl=en-IN</a> [Move media from one cast device to another] (“At the bottom-left corner of the screen, tap Devices  to see the list of available devices and speaker groups. . . . Select the device for which you want to move your media.”).</p> <p>Cast-enabled displays installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube and YouTube Music apps, as illustrated by the following photos:</p> <div data-bbox="673 886 1002 1377">  </div> <div data-bbox="673 367 1002 848">  </div> <p>Additionally, Cast-enabled displays installed with various third-party Cast-enabled apps are also programmed to perform this functionality, including but not limited to the Spotify app, as illustrated by the following photo:</p> |



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <div data-bbox="232 659 534 1140" data-label="Image"> </div> <p>Various other Cast-enabled apps available for installation on Cast-enabled displays provide similar functionality.</p> <p>As noted above, for the first time on February 3, 2022, Google proposed a construction of the term “playback queue” that would require “[a]n ordered list of multimedia items that is selected by the user for playback,” and it appears Google intends to argue that the accused [REDACTED] queue is not a “remote playback queue” because it is not “[a]n ordered list of multimedia items that is selected by the user for playback.” However, even if the Court were to adopt such a construction for “playback queue,” Sonos maintains that the accused [REDACTED] queue would still amount to the claimed “remote playback queue” either literally or at the very least under the DoE for all of the reasons explained above in connection with claim limitation 1.4, and because of this, each Cast-enabled computing device installed with any one of the YouTube, YouTube Music, YouTube TV, or YouTube Kids apps would still satisfy claim limitation 1.5 either literally or at the very least under DoE.</p> <p>For instance, because a [REDACTED] queue literally amounts to a “remote playback queue” for the reasons explained above, the foregoing functionally literally amounts to the claimed functionality of claim limitation 1.5, which involves “displaying a representation of one or more playback devices in a media playback system that are each i) communicatively coupled to the computing device over a data network and ii) available to accept playback responsibility for <i>the remote playback queue</i>.”</p> <p>Moreover, to the extent that the Court adopts Google’s construction of “playback queue” and Google then later tries to argue that a the [REDACTED] queue does not literally amount to an “ordered list of multimedia items that is selected by the user for playback” unless every single media item in the [REDACTED] queue is</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

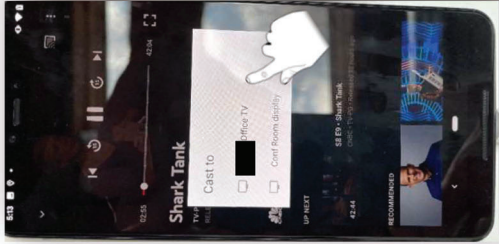
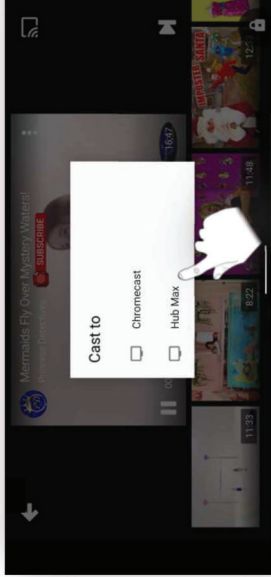
| Claim 1  | Accused Instrumentalities  |
|--|--|
|  | <p>directly selected by the user, the relevant functionality carried out by a Cast-enabled computing device with respect to a [REDACTED] queue containing at least one media item that was directly selected by a user and other items that were not directly selected by a user (e.g., media items identified by a YouTube service based on the user's selection) still satisfies claim limitation 1.5 (as well as the other claim limitations that refer to a "remote playback queue") under DoE. This is because there is merely an insubstantial difference between (i) a representation that a Cast-enabled media player is able to accept responsibility for playback of a "remote playback queue" in which all of the media items were directly selected by a user and (ii) a representation that a Cast-enabled media player is able to accept responsibility for playback of a "remote playback queue" in which only the initial media item was directly selected by the user while the other media item was identified based on the user's selection of the initial media item. Indeed, a Cast-enabled computing device performs the same function (e.g., displaying a representation of one or more Cast-enabled media players that are available to accept playback responsibility for the [REDACTED] queue), in the same way (e.g., by rendering such the representation on a display screen), to achieve the same result (e.g., presenting a user with an indication of one or more Cast-enabled media players that are available to accept playback responsibility for the [REDACTED] queue) <i>regardless</i> of whether the media items in the [REDACTED] queue were all directly selected by a user or only the initial media item in the [REDACTED] queue was directly selected by the user and the rest were identified based on the user's selection.</p> <p>Sonos further incorporates by reference Google's response to Sonos's Fact Discovery Interrogatory No. 14, including any of Google's documents or source code cited therein. <i>See</i> Google LLC's First Objections and Responses to Plaintiff Sonos, Inc.'s First Set of Fact Discovery Interrogatories.</p> |
| <p>[1.6] while displaying the representation of the one or more playback devices, receiving user input indicating a selection of at least one given playback device from the one</p> | <p>Each Cast-enabled control device comprises program instructions stored on the Cast-enabled control device's non-transitory computer-readable medium that, when executed by the Cast-enabled control device's processor, cause the Cast-enabled control device to, while displaying the representation of the one or more Cast-enabled media players, receive user input indicating a selection of at least one given Cast-enabled media player from the one or more Cast-enabled media players.</p> <p>For instance, each Cast-enabled computing device is programmed such that, while displaying the representation of the one or more Cast-enabled media players in a Cast-enabled playback system that are each on the same Wi-Fi network as the Cast-enabled computing device and available to accept playback responsibility for the remote playback queue, the Cast-enabled computing device is configured to receive user input indicating a selection of at least one Cast-enabled media player in the Cast-enabled playback system,</p>  |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1                          | Accused Instrumentalities  |
|----------------------------------|--|
| <p>or more playback devices;</p> | <p>which is the claimed “at least one given playback device” selected from “the one or more playback devices.” See, e.g., <a href="https://support.google.com/googlenest/answer/7181830">https://support.google.com/googlenest/answer/7181830</a> [Play media from Chromecast-enabled apps to your speaker or display] (“Tap the speaker or display for which you’d like to cast.”); <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to speakers] (“3. Choose your speaker.”); <a href="https://support.google.com/chromecast/answer/2995235?hl=en-AU">https://support.google.com/chromecast/answer/2995235?hl=en-AU</a> [Cast from the YouTube app and YouTube.com] (“Tap the Chromecast device to which you want to cast.”); <a href="https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en">https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en</a> [Cast YouTube TV using Chromecast] (“4. Choose the device you want to cast to.”); <a href="https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid">https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid</a> [Watch YouTube Kids videos on your TV]; <a href="https://support.google.com/googlenest/answer/9563059?hl=en-IN">https://support.google.com/googlenest/answer/9563059?hl=en-IN</a> [Move media from one cast device to another].</p> <p>Cast-enabled computing devices installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube, YouTube Music, YouTube TV, and YouTube Kids apps, as illustrated by the following screenshots:</p> <div data-bbox="850 632 1344 1213"> </div> |



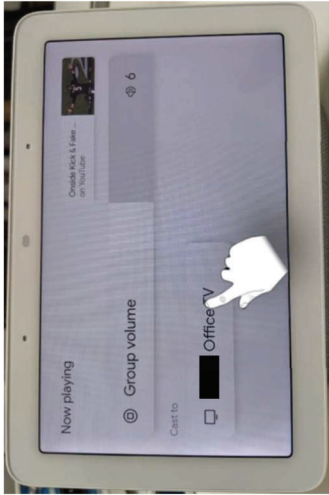
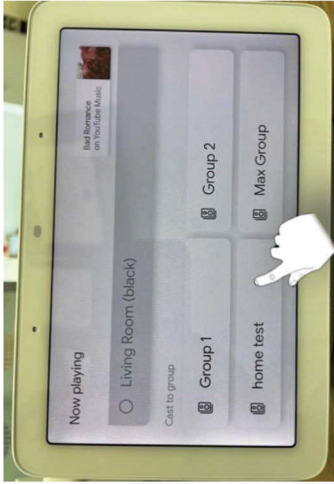
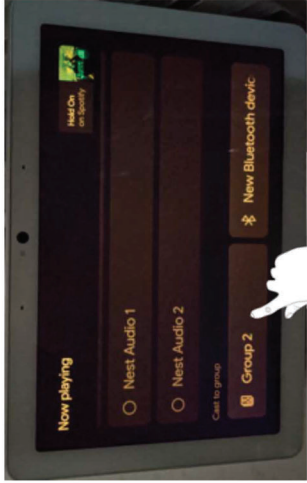
Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <div data-bbox="261 1140 756 1381"></div> <div data-bbox="488 464 756 1037"></div> <p data-bbox="829 1430 862 1610"><i>See also, e.g.,</i> [REDACTED]</p> <p data-bbox="938 247 1047 1610">Likewise, Cast-enabled computing devices installed with various third-party Cast-enabled apps are also programmed to perform this functionality, including but not limited to the Spotify app, as illustrated by the following screenshot:</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <div data-bbox="263 808 761 1039" data-label="Image"> </div> <p>Various other Cast-enabled apps available for installation on Cast-enabled computing devices provide similar functionality. <i>See, e.g.,</i> <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to speakers]; <a href="https://www.google.com/chromecast/built-in/apps/">https://www.google.com/chromecast/built-in/apps/</a>.</p> <p>Each Cast-enabled display is also programmed such that, while displaying the representation of the one or more other Cast-enabled media players in a Cast-enabled playback system that are each on the same Wi-Fi network as the Cast-enabled display and available to accept playback responsibility for the remote playback queue, the Cast-enabled display is configured to receive user input indicating a selection of at least one other Cast-enabled media player in the Cast-enabled playback system, which is the claimed “at least one given playback device” selected from “the one or more playback devices.” <i>See, e.g.,</i> <a href="https://support.google.com/googlenest/answer/9563059?hl=en-IN">https://support.google.com/googlenest/answer/9563059?hl=en-IN</a> [Move media from one cast device to another] (“Select the device(s) to which you want to move your media.”).</p> <p>Cast-enabled displays installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube and YouTube Music apps, as illustrated by the following photos:</p> |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1  | Accused Instrumentalities  |
|--|--|
|  | <div data-bbox="272 928 599 1419"></div> <div data-bbox="267 386 599 867"></div> <p data-bbox="638 189 743 1623">Additionally, Cast-enabled displays installed with various third-party Cast-enabled apps are also programmed to perform this functionality, including but not limited to the Spotify app, as illustrated by the following photo:</p> <div data-bbox="743 701 1047 1180"></div> <p data-bbox="1047 346 1117 1623">Various other Cast-enabled apps available for installation on Cast-enabled displays provide similar functionality.</p>           |
| [1.7] based on receiving the user input, transmitting an instruction for | <p data-bbox="1157 189 1263 1623">Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory No. 14, including any of Google’s documents or source code cited therein. See Google LLC’s First Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact Discovery Interrogatories.</p> <p data-bbox="1268 189 1414 1623">Each Cast-enabled control device comprises program instructions stored on the Cast-enabled control device’s non-transitory computer-readable medium that, when executed by the Cast-enabled control device’s processor, cause the Cast-enabled control device to, based on receiving the user input, transmit an instruction for the at least one given Cast-enabled media player to take over responsibility for playback of the remote</p> |



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1   | Accused Instrumentalities   |
|---|---|
| <p>the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device, wherein the instruction configures the at least one given playback device to (i) communicate with the cloud-based computing system in order to obtain data identifying a next one or more media items that are in the remote playback queue, (ii) use the remote playback queue from the cloud-based media service; and (iii) play back the retrieved at least one media item.</p> | <p>playback queue from the Cast-enabled control device, wherein the instruction configures the at least one given Cast-enabled media player to (i) communicate with the cloud-based computing system in order to obtain data identifying a next one or more media items that are in the remote playback queue, (ii) use the obtained data to retrieve at least one media item in the remote playback queue from the cloud-based media service, and (iii) play back the retrieved at least one media item.</p> <p>For instance, each Cast-enabled control device is programmed such that, based on receiving user input indicating a selection of at least one Cast-enabled media player in the Cast-enabled playback system that is on the same Wi-Fi network as the Cast-enabled control device and available to accept playback responsibility for the remote playback queue, the Cast-enabled control device is operable to transmit an instruction for the at least one Cast-enabled media player (which is the claimed “at least one given playback device”) to take over responsibility for playback of the remote playback queue from the Cast-enabled computing device, where the instruction configures the at least one Cast-enabled media player to:</p> <ul style="list-style-type: none"> <li>• communicate with one or more cloud servers associated with a cloud-based media service (e.g., a Google service such as YouTube, YouTube Music, YouTube TV, YouTube Kids, etc., or a third-party service such as Spotify, etc.) that is remote from the Cast-enabled computing device and the at least one Cast-enabled media player and accessible over the Internet, which may be operated by Google or a third-party service provider, in order to obtain data identifying a next one or more media items that are in the remote playback queue (e.g., resource locators for such media items),</li> <li>• use the obtained data to retrieve at least one media item in the remote playback queue from the cloud-based media service; and</li> <li>• play back the retrieved at least one media item.</li> </ul> <p>See, e.g., <a href="https://support.google.com/googlenest/answer/7181830">https://support.google.com/googlenest/answer/7181830</a> [Play media from Chromecast-enabled apps to your speaker or display]; <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to speakers]; <a href="https://support.google.com/chromecast/answer/2995235?hl=en-AU">https://support.google.com/chromecast/answer/2995235?hl=en-AU</a> [Cast from the YouTube app and YouTube.com]; <a href="https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en">https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en</a> [Cast YouTube TV using Chromecast]; <a href="https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid">https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid</a> [Watch YouTube Kids videos on your TV]; <a href="https://support.google.com/googlenest/answer/9563059?hl=en-IN">https://support.google.com/googlenest/answer/9563059?hl=en-IN</a> [Move</p> |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY

| Claim 1                            | Accused Instrumentalities   |
|------------------------------------|---|
| retrieved at least one media item; | <p>media from one cast device to another]; <a href="https://developers.google.com/cast/docs/web_receiver/queueing">https://developers.google.com/cast/docs/web_receiver/queueing</a>; <a href="https://developers.google.com/cast/docs/ios_sender/queueing">https://developers.google.com/cast/docs/ios_sender/queueing</a> (“The Web Receiver SDK maintains the queue and responds to operations on the queue as long as the queue has at least one item currently active (playing or paused).”); <a href="https://developers.google.com/cast/docs/android_sender/queueing">https://developers.google.com/cast/docs/android_sender/queueing</a> (“The Receiver SDK maintains the queue and responds to operations on the queue as long as the queue has at least one item currently active (playing or paused).”).</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED] <a href="https://developers.google.com/cast/docs/ios_sender/queueing">https://developers.google.com/cast/docs/ios_sender/queueing</a> (“The Web <i>Receiver</i> SDK maintains the <i>queue</i> and responds to operations on the queue as long as the <i>queue</i> has at least one item currently active (playing or paused).”);</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> |

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



40

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         | [REDACTED]                |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p>Further details regarding how a Cast-enabled control device carries out this functionality, along with representative examples of evidence demonstrating this functionality, are summarized below.</p> <p><b><u>YouTube, YouTube Music, YouTube TV, &amp; YouTube Kids apps</u></b></p> <p>Each Cast-enabled computing device installed with any one of the YouTube, YouTube Music, YouTube TV<sup>11</sup>, or YouTube Kids app is programmed such that, after receiving user input indicating a selection of at least one particular Cast-enabled media player in the Cast-enabled playback system that is to take over playback responsibility, the Cast-enabled computing device functions to:</p> <ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> <li>• [REDACTED]</li> </ul> |

<sup>11</sup> For YouTube TV, the below functionality is applicable in situations where the user selects to playback multimedia content from the user’s “Library” or YouTube TV’s “On Demand” catalog, as opposed to from YouTube TV’s “Live” content. See, e.g., <https://support.google.com/youtubetv/answer/7129564> [Record shows, sports, events, & movies].

| Government          | Percentage |
|---------------------|------------|
| Current government  | 85%        |
| Previous government | 15%        |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

[REDACTED]

**Ex. B – Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <p>The messages that are sent by the Cast-enabled computing device as part of this process individually or collectively amount to the claimed “instruction for the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device.”</p> <p>Moreover, Sonos contends that the data contained in Google’s “WatchNextResponse” data structure and in Google’s upNextVideoId data variable, individually and collectively, amounts to the claimed “obtained” data identifying a next one or more media items that are in the remote playback queue.”</p> <p>As noted above, for the first time on February 3, 2022, Google proposed a construction of the term “playback queue” that would require “[a]n ordered list of multimedia items that is selected by the user for playback,” and it appears Google intends to argue that the accused [REDACTED] queue is not a “remote playback queue” because it is not “[a]n ordered list of multimedia items that is selected by the user for playback.” However, even if the Court were to adopt such a construction for “playback queue,” Sonos maintains that the accused [REDACTED] queue would still amount to the claimed “remote playback queue” either literally or at the very least under the DoE for all of the reasons explained above in connection with claim limitation 1.4, and because of this, each Cast-enabled computing device installed with any one of the YouTube, YouTube Music, YouTube TV, or YouTube Kids apps would still satisfy claim limitation 1.7 either literally or at the very least under DoE.</p> <p>For instance, because a [REDACTED] queue literally amounts to a “remote playback queue” for the reasons explained above, the foregoing functionally literally amounts to the claimed functionality of claim limitation 1.7, which involves “transmitting an instruction for the at least one given playback device to take over</p> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <p>responsibility for playback of the <i>remote playback queue</i> from the computing device, wherein the instruction configures the at least one given playback device to (i) communicate with the cloud-based computing system in order to obtain data identifying a next one or more media items that are in the <i>remote playback queue</i>, (ii) use the obtained data to retrieve at least one media item in the <i>remote playback queue</i> from the cloud-based media service; and (iii) play back the retrieved at least one media item.”</p> <p>Moreover, to the extent that the Court adopts Google’s construction of “playback queue” and Google then later tries to argue that a the [REDACTED] queue does not literally amount to an “ordered list of multimedia items that is selected by the user for playback” unless every single media item in the [REDACTED] queue is directly selected by the user, the relevant functionality carried out by a Cast-enabled computing device and a Cast-enabled media player with respect to a [REDACTED] queue containing at least one media item that was directly selected by a user and other items that were not directly selected by a user (e.g., media items identified by a YouTube service based on the user’s selection) still satisfies claim limitation 1.7 (as well as the other claim limitations that refer to a “remote playback queue”) under DoE. This is because there is merely an insubstantial difference between (i) a Cast-enabled computing device transmitting an instruction for a Cast-enabled media player to take over responsibility for playback of a “remote playback queue” in which all of the media items were directly selected by a user and (ii) a Cast-enabled computing device transmitting an instruction for a Cast-enabled media player to take over responsibility for playback of a “remote playback queue” in which only the initial media item was directly selected by the user while the other media item was identified based on the user’s selection of the initial media item. Indeed, a Cast-enabled computing device performs the same function (e.g., instructing a Cast-enabled media player to take over responsibility for playback of the [REDACTED] queue), in the same way (e.g., by transmitting the instruction over a data network), to achieve the same result (e.g., configuring the Cast-enabled media player to perform the playback-device functions recited in claim limitation 1.7) <i>regardless</i> of whether the media items in the [REDACTED] queue were all directly selected by a user or only the initial media item in the [REDACTED] queue was directly selected by the user and the rest were identified based on the user’s selection. And likewise, a Cast-enabled media player performs the same functions (e.g., obtaining data identifying a next one or more media items that are in the [REDACTED] queue and using the obtained data to retrieve at least one media item in the [REDACTED] queue from the cloud-based media service), in the same way (e.g., by communicating with one or more cloud servers), to achieve the same result (e.g., assuming responsibility for playback of the [REDACTED] queue) <i>regardless</i> of whether the media items in the [REDACTED] queue were</p> |

**Ex. B—Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

[illegible]



1000 JOURNAL OF CLIMATE

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

\_\_\_\_\_

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

\_\_\_\_\_



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

\_\_\_\_\_

■

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |




**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

■   
■ 

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         |  |



**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p data-bbox="461 218 565 1608">Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory Nos. 14-15, including any of Google’s documents or source code cited therein. <i>See</i> Google LLC’s First Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact Discovery Interrogatories.</p> <p data-bbox="607 1457 639 1608"><u><b>Spotify app</b></u></p> <p data-bbox="680 210 818 1608">Each Cast-enabled control device installed with the Spotify app (which is Cast-enabled and utilizes the Cast SDK) is programmed such that, after receiving user input indicating a selection of at least one particular Cast-enabled media player in the Cast-enabled playback system that is to take over playback responsibility, the Cast-enabled computing device functions to:</p> <ul data-bbox="829 210 1383 1562" style="list-style-type: none"> <li>• (i) instruct the particular Cast-enabled media player to launch the Spotify app and “connect” to the Cast-enabled computing device;</li> <li>• (ii) instruct the particular Cast-enabled media player to takeover playback of a remote queue (e.g., a “Spotify queue”) from the Cast-enabled computing device (e.g., via a [REDACTED]), which causes the particular Cast-enabled media player to: <ul style="list-style-type: none"> <li>• (a) communicate with one or more cloud servers providing the remote queue previously being played by the Cast-enabled computing device to obtain from the one or more cloud servers one or more media-item identifiers (e.g., “[REDACTED]” from the remote queue and playback a first media item;</li> <li>• (b) before finishing playback of the first media item, communicate with the one or more cloud servers to obtain data identifying a next one or more media items that are in the remote playback queue (e.g., “Spotify queue”);</li> <li>• (c) use the obtained data to retrieve at least one media item in the remote playback queue from the Spotify media service; and</li> <li>• (d) play back the retrieved at least one media item;</li> </ul> </li> </ul> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <ul style="list-style-type: none"> <li>• (iii) detect an indication that the particular Cast-enabled media player has taken over playback responsibility for the remote queue; and</li> <li>• (iv) transition its operating state from a local playback mode to a remote playback mode (e.g., switch its “control category” to “remote playback”) in which the Cast-enabled computing device is configured to control the particular Cast-enabled media player’s playback of media content rather than engaging in playback of the media content itself.</li> </ul> <p>The messages that are sent by the Cast-enabled computing device as part of this process individually or collectively amount to the claimed “instruction for the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device.”</p> <p>The following exemplary evidence demonstrates that each Cast-enabled control device installed with the Spotify app is programmed with this functionality:</p> <ul style="list-style-type: none"> <li>• [REDACTED]</li> <li>• <a href="https://developers.google.com/cast/docs/web_receiver/queueing?hl=en">https://developers.google.com/cast/docs/web_receiver/queueing?hl=en</a> (“Queueing allows partner applications to better integrate with Cast by providing the following features: Support of Google’s and partner’s cloud queue implementation so externally stored and created queue can be directly loaded into Cast devices.”);</li> <li>• <a href="https://developers.google.com/cast/docs/reference/web_sender/chrome.cast.media.MediaInfo">https://developers.google.com/cast/docs/reference/web_sender/chrome.cast.media.MediaInfo</a>;</li> <li>• <a href="https://developers.google.com/cast/docs/reference/web_sender/chrome.cast.media.LoadRequest">https://developers.google.com/cast/docs/reference/web_sender/chrome.cast.media.LoadRequest</a>.</li> </ul> <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory Nos. 14-15, including any of Google’s documents or source code cited therein. <i>See</i> Google LLC’s First Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact Discovery Interrogatories.</p> |

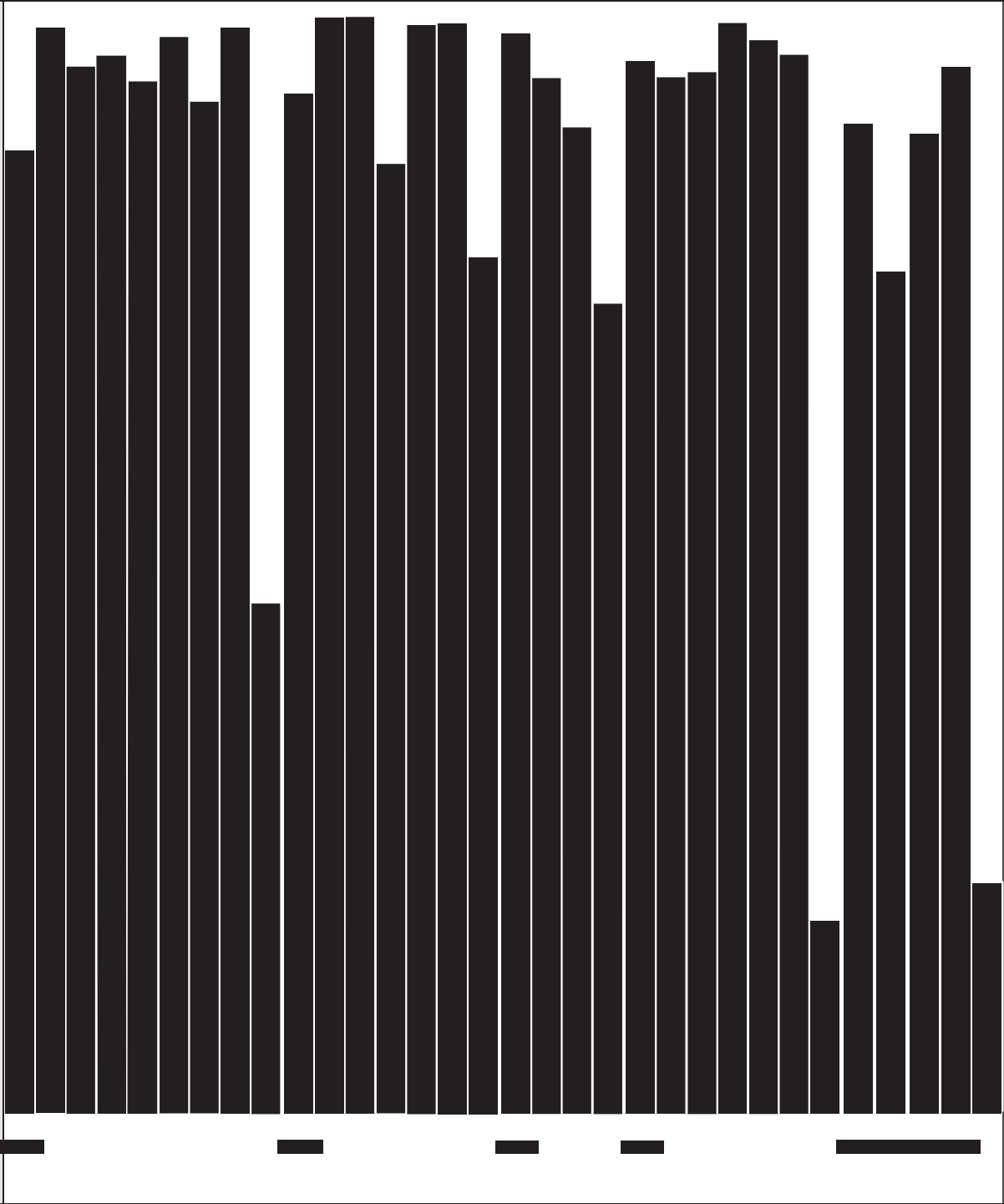
**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p><b><u>Cast-Enabled Displays</u></b></p> <p>Each Cast-enabled display is programmed such that, after receiving user input indicating a selection of at least one particular Cast-enabled media player in the Cast-enabled playback system that is to take over playback responsibility, the Cast-enabled display functions to:</p> <ul style="list-style-type: none"> <li>• (i) instruct the particular Cast-enabled media player to launch whichever app the Cast-enabled display was playing audio content (e.g., music, podcasts, etc.) and/or audiovisual content (e.g., videos) <del>content</del> from when it detected the set of inputs (e.g., via a [REDACTED] that gets transmitted over Wi-Fi after the Cast-enabled display processes an internal “set playback devices” message and an internal [REDACTED]);</li> <li>• (ii) transfer the state of the Cast-enabled display’s current playback session of a remote queue to the particular Cast-enabled media player (e.g., via a [REDACTED]), which in turn causes the particular Cast-enabled media player to: <ul style="list-style-type: none"> <li>• (a) communicate with one or more cloud servers providing the remote queue previously being played by the Cast-enabled display to obtain from the one or more cloud servers one or more media-item identifiers (e.g., [REDACTED]) from the remote queue and playback a first media item;</li> <li>• (b) before finishing playback of the first media item, communicate with the one or more cloud servers to obtain data identifying a next one or more media items that are in the remote playback queue;</li> <li>• (c) use the obtained data to retrieve at least one media item in the remote playback queue from the same streaming content service that the Cast-enabled display was playing back from when it received the user input; and</li> <li>• (d) play back the retrieved at least one media item;</li> </ul> </li> <li>• (iii) detect an indication that the particular Cast-enabled media player has taken over playback responsibility for the remote queue; and</li> <li>• (iv) transition its operating state from a local playback mode to a remote playback mode in which the Cast-enabled computing device is configured to control the particular Cast-enabled media player’s playback of media content rather than engaging in playback of the media content itself.</li> </ul> |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         | <p>The messages that are sent by the Cast-enabled display as part of this process individually or collectively amount to the claimed “instruction for the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device.”</p> <p>The following exemplary evidence demonstrates that each Cast-enabled display is programmed with this functionality:</p> <ul style="list-style-type: none"> <li>• <a href="https://developers.google.com/cast/docs/web_receiver/core_features">https://developers.google.com/cast/docs/web_receiver/core_features</a> (“Stream transfer[.] Preserving session state is the basis of stream transfer, a CAF feature where users can move existing audio and video streams across devices using ... smart displays. Media stops playing on one device (the source) and continues on another (the destination).... The event flow for stream transfer is:             <ol style="list-style-type: none"> <li>1. On the source device:                 <ol style="list-style-type: none"> <li>a. Media stops playing.</li> <li>b. The Web Receiver application receives a command to save the current media state.</li> <li>c. The Web Receiver application is shut down.</li> </ol> </li> <li>2. On the destination device:                 <ol style="list-style-type: none"> <li>a. The Web Receiver application is loaded.</li> <li>b. The Web Receiver application receives a command to restore the saved media state.</li> <li>c. Media resumes playing.</li> </ol> </li> </ol> </li> </ul> <p>Elements of media state include:</p> <ul style="list-style-type: none"> <li>• Specific position or timestamp of the song, video, or media item.</li> <li>• Its place in a broader queue (such as a playlist or artist radio).</li> <li>• The authenticated user.</li> <li>• Playback state (for example, playing or paused).”),</li> <li>• <i>Id.</i> (“Preserving session state[.] The Web Receiver SDK provides a default implementation for Web Receiver apps to preserve session states by taking a snapshot of current media status, converting the status into a load request, and resuming the session with the load request.”);</li> <li>• <a href="https://developers.google.com/cast/docs/reference/web_receiver/cast.framework.messages.LoadRequestData">https://developers.google.com/cast/docs/reference/web_receiver/cast.framework.messages.LoadRequestData</a> [Class: LoadRequestData];</li> <li>• <a href="https://developers.google.com/cast/docs/reference/web_sender/chrome.cast.media.MediaInfo">https://developers.google.com/cast/docs/reference/web_sender/chrome.cast.media.MediaInfo</a> [Class: MediaInfo];</li> </ul> |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         |  |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <div data-bbox="228 1543 357 1564" style="background-color: black; height: 10px; width: 79px;"></div> <div data-bbox="228 277 267 1514" style="background-color: black; height: 189px; width: 24px;"></div> <div data-bbox="267 327 306 1514" style="background-color: black; height: 165px; width: 24px;"></div> <div data-bbox="306 228 345 1514" style="background-color: black; height: 141px; width: 24px;"></div> <div data-bbox="345 1367 383 1514" style="background-color: black; height: 70px; width: 24px;"></div> <p data-bbox="418 306 493 1608">Representative excerpts of Google’s Cast-enabled display source code<sup>26</sup> related to the aforementioned functionality include:</p> <div data-bbox="503 189 1282 1656" style="background-color: black; height: 699px; width: 480px;"></div> |

---

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**

| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY**


**Claim 1**

**Accused Instrumentalities**





**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

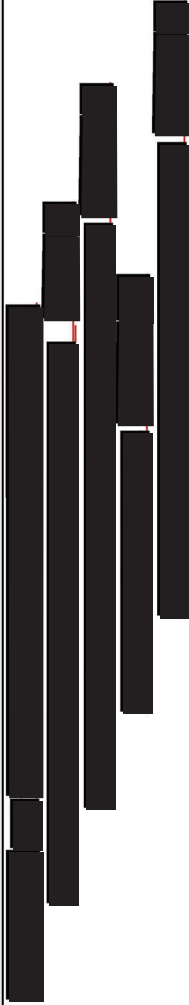
| Claim 1 | Accused Instrumentalities   |
|---------|---|
|         |  |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS' EYES ONLY

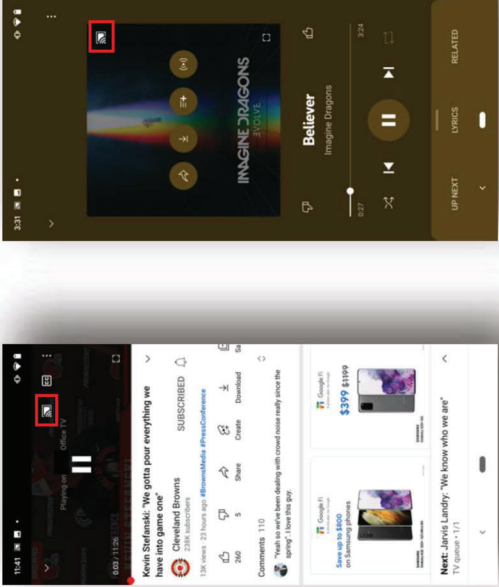
| Claim 1 | Accused Instrumentalities |
|---------|---------------------------|
|         |                           |

[REDACTED]

**Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033**  
**HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY**

| Claim 1  | Accused Instrumentalities   |
|--|---|
|  |   |
| <p>[1.8] detecting an indication that playback responsibility for the remote playback queue has been successfully transferred from the computing device to the at least one given playback device;</p> | <p>Sonos further incorporates by reference Google’s response to Sonos’s Fact Discovery Interrogatory Nos. 14-15, including any of Google’s documents or source code cited therein. <i>See</i> Google LLC’s First Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact Discovery Interrogatories.</p> <p>Each Cast-enabled control device comprises program instructions stored on the Cast-enabled control device’s non-transitory computer-readable medium that, when executed by the Cast-enabled control device’s processor, cause the Cast-enabled control device to detect an indication that playback responsibility for the remote playback queue has been successfully transferred from the Cast-enabled control device to the at least one given Cast-enabled media player.</p> <p>For instance, each Cast-enabled computing device is programmed with the capability to detect an indication that playback responsibility for the remote playback queue has been successfully transferred from the Cast-enabled computing device to at least one Cast-enabled media player (which is the claimed “at least one given playback device”), which is demonstrated by the fact that the Cast-enabled computing device displays an indicator that playback responsibility for the remote playback queue has been successfully transferred to the at least one Cast-enabled media player that takes the form of a “Cast button” that is “filled in” or turns “dark grey” (among other factors confirming that the Cast-enabled computing device has detected an indication that playback responsibility for the remote playback queue has been successfully transferred to at least one Cast-enabled media player). <i>See, e.g.,</i> <a href="https://support.google.com/chromecast/answer/6279384?hl=en">https://support.google.com/chromecast/answer/6279384?hl=en</a> [Cast audio from Chromecast-enabled apps to Chromecast-enabled apps to your speaker or display] (“When you’re connected, the Cast button will turn from light to dark grey, letting you know that you’re connected.”); <a href="https://support.google.com/chromecast/answer/2995235?hl=en-AU">https://support.google.com/chromecast/answer/2995235?hl=en-AU</a> [Cast from the YouTube app and YouTube.com]; <a href="https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en">https://support.google.com/youtubetv/answer/7353493?co=GENIE.Platform%3DAndroid&amp;hl=en</a> [Cast YouTube TV using Chromecast];</p> |

Ex. B –Infringement Contention Chart: U.S. Patent No. 10,779,033  
HIGHLY CONFIDENTIAL - SOURCE CODE - ATTORNEYS’ EYES ONLY

| Claim 1 | Accused Instrumentalities  |
|---------|--|
|         | <p data-bbox="235 233 342 1610"><a href="https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid">https://support.google.com/youtubekids/answer/6289408?hl=en&amp;co=GENIE.Platform%3DAndroid</a> [Watch YouTube Kids videos on your TV]; <a href="https://support.google.com/chromecast/answer/3265953?hl=en">https://support.google.com/chromecast/answer/3265953?hl=en</a> [Chromecast-enabled site vs. casting a tab].</p> <p data-bbox="381 233 488 1610">Cast-enabled computing devices installed with various of Google’s own Cast-enabled apps are programmed to perform this functionality, including but not limited to the YouTube, YouTube Music, YouTube TV, and YouTube Kids apps, as illustrated by the following screenshots:</p> <div data-bbox="557 632 1052 1215"></div> |